DOCUMENT RESUME

ED 390 240 EC 304 505

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TITLE Current Issues: Interpreters in the Educational Setting.
INSTITUTION National Technical Inst. for the Deaf, Rochester, N. Y.
PUB DATE Jul 95
NOTE 25p.; Paper presented at the International Congress on Education of the Deaf (18th, Tel Aviv, Israel, July 16-20, 1995).
PUB TYPE Viewpoints (Opinion/Position Papers, Essays, etc.) (120)

EDRS PRICE MF01/PC01 Plus Postage.
DESCRIPTORS *Certification; *Deaf Interpreting; *Deafness; Elementary Secondary Education; *Interpreters; Interpretive Skills; Occupational Information; Standards; *Work Environment
IDENTIFIERS *National Task Force on Educational Interpreting

ABSTRACT

This paper summarizes and comments on a report by the National Task Force on Educational Interpreting, which consists of educational interpreters, teachers, school administrators, teacher educators, parents, and deaf consumers. The Task Force found a critical need for: (1) the establishment of standards for educational interpreting, and (2) promoting improved working conditions and equitable salary ranges for educational interpreters. The state of the profession of educational interpreting is described, and it is found that professional interpreters are available at all grade levels, that working conditions and compensation vary widely, and that many schools are uninformed and inexperienced about the uses of interpreters. Problems identified by the Task Force are discussed, accompanied by the Task Force's recommended solutions. Changes to certification standards to establish a joint certification system usable by the Department of Education in each state are described, and a model job description for educational interpreters is provided. (PB)

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# Current Issues: Interpreters in the Educational Setting

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Educational Support Services Programs

Running Head: INTERPRETERS IN THE EDUCATIONAL SETTING

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Background

A National Task Force on Educational Interpreting (Stuckless, Avery, and Hurwitz, 1989) was established in 1985 to examine and clarify roles and responsibilities, training and certification, working conditions, and other issues and needs concerning educational interpreters and their services to mainstreamed deaf students at all educational levels. This Task Force represents seven national organizations, with its coordinative support coming from NTID. These organizations are the following: American Society for Deaf Children, Alexander Graham Bell Association for the Deaf, Convention of American Instructors of the Deaf, Conference of Educational Administrators Serving the Deaf, Conference of Interpreter Trainers, National Association of the Deaf, and Registry of Interpreters for the Deaf.

Interpreting first achieved recognition as a vocation in the early 1960's, primarily as a service to adults. Its applications to postsecondary education of deaf students became evident in the late 1960's with the emergence of the postsecondary movement for deaf students in mainstream college settings. This was later reinforced by Section 504 of the Rehabilitation Act of 1973.

The subsequent passage of PL 94-142 in 1974 was instrumental in extending the need and demand for interpreting services down into the elementary and secondary educational levels and into many if not most of the local school districts throughout the country. This caught both interpreters and educators largely unprepared. The interpreter's role in this new setting was generally undefined and not really understood by school administrators, teachers with whom the interpreter was working, or the parents of deaf students.

Few interpreters had any formal training for working in an educational setting with deaf children, and virtually none had formal preparation as educational interpreters since interpreter

training programs were ambivalent about their own roles (many carrying the job title "teacher's aide"). Qualified interpreters were scarce, and in many communities unavailable. Working conditions for interpreters in most schools were poor and turnover high.

These same circumstances continue to prevail in many areas of the country today, IEP's notwithstanding, and in spite of the dependence of thousands of mainstreamed deaf students on interpreting as a basic support service. The National Task Force on Educational Interpreting was established to address these and related issues and needs.

The Task Force consists of approximately 40 persons and is a mix of educational interpreters and interpreter trainers, teachers and school administrators, teacher educators, parents, deaf consumers, and specialists in education and related services to deaf students. It first met in November, 1985, and this led to a draft of a report which was used as a guidance paper for subsequent activities of the Task Force. A steering committee met twice and formed several working committees which were engaged in specific assignments. The report of the Task Force was completed and reviewed by the full Task Force which is now ready for dissemination.

Discussion

For many hearing-impaired students, the educational interpreter offers an indispensable service for assistance in communication. Public Law 94-142 is not going to work for these students unless they have the services of the interpreter. Unfortunately, the importance of the educational interpreter often receives little acknowledgment from teachers, administrators, school districts, and government officials.

It is important that educational interpreting be given support as an essential service, and recognize educational interpreters as members of an educational team working together to assist

hearing-impaired students learn and achieve in mainstream settings at all educational levels. The key state education departments should also have a role in examining the issues involving interpreters and their importance in the education of deaf students. These issues are broad and varied.

If students in need of interpreting support are placed in mainstream settings and activities with poor or no interpreting support, this has serious implications. The increasing number of hearing-impaired students in mainstream settings has resulted in a much higher demand and widespread need for qualified educational interpreters than are available, leading to the employment of untrained, unqualified interpreters, and often no interpreter at all.

It is common for there to be no one in the environment with the appropriate competencies to evaluate and supervise the interpreter, or to suggest professional growth opportunities and training.

Based on input received by the National Task Force on Educational Interpreting, it is apparent that job functions vary greatly across working environments and educational levels. Often there is no clear job description, giving rise to ambiguity about functions and a lack of understanding of the interpreter's role by the hearing-impaired student, the mainstream classroom teacher, the parents, and the interpreter her/himself.

Recommendations

The National Task Force determined that there is a critical need (1) for the establishment of standards for educational interpreting in order to assist in insuring equal access for deaf and hard of hearing students in educational mainstream settings and (2) for promoting improved working conditions and equitable salary ranges as determined by skill level required and

advanced training expectations. Appendices A and B provide an outline and framework from the National Task Force Report for addressing critical issues and concerns related to qualify and effective delivery of educational interpreting.

Major Conditions of Educational Interpreting

Specifically, the National Task Force identified seven major conditions which influence educational interpreting in school systems (See Appendix A). First, educational interpreting is viewed as an evolving professional occupation. Some of us may recall that during the 1950's and early 1960's, interpreting was generally a volunteer activity which was normally performed by the hearing children or hearing spouse of the deaf person(s) who possessed good sign language skills. Actually, what they did was not what we would call interpreting in its simultaneous form; that is, listening to a spoken message and delivering a signed message at the same time. In the past, the hearing signer would listen to a spoken message for a while and then stop the hearing speaker and deliver a summarized version to the deaf person highlighting what needed to be conveyed. This would continue on a consecutive basis until the hearing speaker was finished. Conversely, the hearing signer would listen to a deaf signer for a short period of time, stop the deaf signer and summarize what the deaf person said to the hearing person, continuing until the deaf person was done. Oftentimes, the hearing signer would dominate the conversation and talk at length with the hearing person, leaving the deaf person in the dark with only scant information about what had transpired during the discussion.

It was not until sometime around 1965 when a formal discussion took place at Ball State University in Muncie, Indiana, about the role of an interpreter. This conference led to the

establishment of the national Registry of Interpreters for the Deaf (RID), under the auspices of the National Association of the Deaf (NAD), which received a federal grant for this purpose.

With the advent of legislation to establish the National Technical Institute for the Deaf in Rochester, New York, in 1968, and the four regional postsecondary education programs – the Technical College in St. Paul, Minnesota; Seattle Central Community College in Seattle, Washington; California State University at Northridge; and Delgato in New Orleans (which was replaced by the University of Tennessee at Knoxville), interpreting services have evolved into a professional career. Public Law 94-142, now known as the Individuals with Disabilities Education Act, has created new professional opportunities for educational interpreters in various mainstreamed settings.

Second, we find that there are interpreters at all program levels ranging from elementary to postsecondary. Responsibilities vary, depending on the educational levels and communication needs of deaf and hearing children and teachers in the educational setting, and the maturity and readiness of each deaf child in the use of an interpreter in the school setting.

Third, it is well known that most schools have little or no experience with educational interpreting. Some anecdotal stories reveal that many local school districts have no concept of what interpreting means, much less what sign language really means. It has been reported that some local school districts would hire a person with minimal sign language skills to interpret for a deaf child. To elaborate, we have learned that a person who had a deaf relative, and who barely knew fingerspelling, was actively recruited to interpret in the classroom! Many people are confused between sign language and interpreting skills, thinking that very little formal training is required to develop interpreting skills.

Even if an individual possesses interpreting skills, many schools are unaware of the need to establish a job description for the interpreter. In many cases, roles and responsibilities are not clearly defined, which often places an interpreter in the awkward position of not knowing what is expected. Supervisors and teachers are often not aware of the interpreter's role, which usually results in confusion about what responsibilities an interpreter should have while not on an interpreting assignment. We have received reports that many interpreters were assigned clerical duties in the office, or given supervisory responsibility for students in the lunchroom. Many school systems lack knowledge or information about recruitment and assessment of qualifications for hiring into interpreting positions.

Fourth, working conditions vary a great deal in terms of compensation and benefits, hours and schedules, supervision and evaluation, professional development and advancement, and physical environment. We found no consistency in the structure for compensation and benefits. Some areas pay interpreters rates which are comparable to those of teachers, and others compensate at or below poverty levels. Many places have no regard for the professionalism in educational interpreting. For instance, in New York many interpreters are hired as a teacher's aide or tutor and are paid accordingly.

Many interpreters are expected to carry a heavy load of interpreting assignments with little or no break time, which is shown to be occupationally hazardous. Repetitive motion injury, or upper extremity cumulative trauma disorder, has become a prevalent concern in the professional interpreting field throughout the United States and the world. At the 1991 World Federation of the Deaf conference in Tokyo, Japan, reports about this problem came from several countries. Preliminary studies have indicated that without careful arrangement of the

interpreter's workload, including period breaks and support for health care for working interpreters, a high rate of injury occurs. At the National Technical Institute for the Deaf in Rochester, New York, we have learned the hard way how work conditions for our staff interpreters must be improved. We found it necessary to allow as much break time as possible between one- and two-hour assignments. For a course or seminar which lasts two hours or more, an interpreting "team" is established. New interpreters are given an incremental assignment in order to provide them with an opportunity to adjust to their new roles, develop sign vocabulary in particular areas, and become familiar with the surroundings, procedures and strategies for effective (word missing?) which take place in the environment. Close supervision and mentoring have been effective in enabling interpreters to develop their repertoire and stamina for the job. It is essential to ensure that staff interpreters are given the chance to continue with their professional development for advancing in their interpreting occupation. Physical environment is another critical factor which contributes to the working conditions for interpreters, e.g. seating and lighting arrangements, visual and noise background, and temperature of the room.

Fifth, we found that many schools are in need of well-informed, impartial guidance in the establishment of educational support services for deaf and hard of hearing students. Many local educational agencies (LEAs) and local school districts are unfamiliar with the aspects of deafness and their impact on the teaching and learning needs of children who are deaf and hard of hearing. In some cases, certain authorities would make an assumption that once an interpreter is assigned, all problems are resolved associated with the deaf child's needs for a particular placement. Communication modality is an issue of which many LEAs are not knowledgeable

and is the driving force behind determining what type of interpreting service would be appropriate for a particular child in a certain setting, e.g. sign language, oral, or cued speech transliteration. We found that there is a need to provide information to LEAs, school authorities, parents, and impartial hearing officers with a range of educational support services which could be considered appropriate auxiliary and related services in the placement process.

Sixth, it is important to recognize that educational interpreters need support to help them feel that they are part of the educational process. Many of them, especially the ones who are in rural areas or in other areas where there is lack of group support for working interpreters, feel the need to seek identity and status with their profession. We have received reports that many interpreters feel very isolated ... one described it as being a "lone wolf" in the field. Special training is limited for interpreters in education settings; this is an issue for everyone who is concerned with interpreting needs, including school authorities, teachers, parents, and students. Also, formal certification or licensure is lacking in many states, and there is a need to continually advocate for better guidelines related to working conditions and certification.

Finally, but not least, is the overriding concern for consumer education which involves everyone who uses the services of an interpreter, including teachers, parents, school authorities, and deaf students. We have been discussing the need for interpreters to be better trained to do their work, but this would not be sufficient if we did not recognize that consumers must be part of the solution. They must be educated to gain a better understanding of the roles and responsibilities of interpreters, as well as their rights and responsibilities in the procurement and use of interpreters.

Problems and Possible Solutions

The document written by the national Task Force on Educational Interpreting offers some general ideas as to how specific problems could be resolved through suggested strategies. In Appendix B, the reader would find that there are 12 problem statements in the left column, with suggested strategies for resolution in the right column. It should be emphasized that these strategies are suggestive and could be presented for the purpose of generating a meaningful dialogue about incidents which could occur in a variety of educational settings. It is possible that certain strategies may work in one setting but not in another. For instance, it has been suggested that "Educational Interpreter" be used as a generic title for the vocation. However, in certain school systems a different title may be more appropriate depending on the job description. We feel that a specific title should reflect the major responsibilities and qualifications listed in the job description. In addition, all persons who apply for an interpreting position should be given a detailed job descriptions which meets local specifications.

The matrix also highlights some of the problems associated with inappropriate interpreting roles and how they can be addressed through assessment and discussion among appropriate individuals in the setting, including the student, teacher, and interpreter. Sometimes an interpreter is not the solution for a particular deaf student, or that student requires an interpreter who is familiar with his or her communication needs.

Certain conflicts between interpreting and non-interpreting duties can be avoided through clear job expectations in the job description, i.e. interpreting is to take a priority over other classroom or school duties. Clear communication between an interpreter and his/her supervisor is essential to ensure that the interpreter is fully aware of what her roles and responsibilities are.

If it is not clear to both parties, then the job description must be reviewed and modified as necessary.

It is important that an interpreter is fully aware of the school policy on communication modality being used in the interpretation process. Appropriate training should be available to interpreters who need it to upgrade or expand their skills. If the school expects an interpreter to become involved in other non-interpreting assignments, e.g. notetaking or tutoring, then appropriate training and support should be provided if the interpreter does not possess skills for these assignments.

Exercising ethical judgement inclusive of age of student, health, safety, and educational considerations must be applied to each educational situation. It may be necessary for an interpreter to depart from the RID Code of Ethics in order to adapt to a student's particular learning needs. Teachers, school authorities and students must be educated on the proper roles and responsibilities of an educational interpreter as well as their rights and responsibilities in the use of an interpreter.

Many schools are in need of specific recommendations regarding job description, announcement and selecting interpreters to work for them. Recommendations regarding general education, background, training, certification, experience, and special skills must be spelled out to enable prospective interpreters to know what they need to work on their qualifications. Further, recommendations pertaining to improvement of unsatisfactory working conditions related to compensation, benefits, hours, schedules, supervision and evaluation, professional development and advancement, and physical environment, should be made available to each local school district.

Considerations for Certification Standards

The National Task Force also submitted a proposal to two national certifying bodies: the Council on Education of the Deaf (CED) and the Registry of Interpreters for the Deaf (RID) to pursue a concept of a joint certification system for educational interpreters which can serve as a model certification system for use by each Department of Education in each state. An ad hoc committee on Educational Interpreter Standards was subsequently and jointly set up by RID and CED.

The committee was charged to do the following:

(i) develop model certification standards for educational interpreters,

(ii) encourage adaption of these standards at the national and state levels,

(iii) determine the feasibility of joint RID/CED certification based on these standards.

The report of the National Task Force on Educational Interpreting, and particularly its sections on preparation and certification, was used as the major guidance document by the Joint Committee. A member of the National Task Force acceptable to both organizations as the joint committee's chairperson and facilitator was jointly appointed by the CED and RID Boards of Directors.

The committee completed the final draft of model certification standards for educational interpreters (Gustason and Sanderson, 1991). It was emphasized that these standards were based on the information compiled by the Task Force on the role and responsibilities of educational interpreters, and the Task Force recommendations for areas in which training was needed. Five areas of competency and an Observation/Practicum were developed and listed in chronological

order: General Education; Foundations in Education and Deafness; Foundations in Interpretation; Educational Interpreting; and Communication and Educational Interpreting Skills. An observation/practicum provides direct experience in integrating the knowledge and skills taught in the competency areas.

The Ad Hoc Committee on Educational Interpreting Standards, like the Task Force, was well aware that these standards are well beyond current training backgrounds of most educational interpreters currently working K-12 levels. It recognizes the fact that training programs for interpreters have not in the past been geared towards preparation for areas listed herein. It also recognizes that the level of training recommended may ultimately mean more advanced study than is presently available.

This suggests the need for a "grandfather clause" which protects experienced and qualified educational interpreters presently working in the field. At the same time, the Committee recognizes that not all working educational interpreters currently have the desired skills or knowledge. Accordingly, when considering certification, the Committee suggests several options or paths to certification as an educational interpreter.

It is also recommended that current pay standards in many states do not yet coincide with the level of preparation recommended by these competencies. However, all competencies were drawn from the Task Force report and the judgement of professionals in the field, including working educational interpreters. Pay scales must depend upon levels of skill, experience, and training. Development of such scales and approval of certification standards must go hand in hand, while making provision for working educational interpreters and recognizing the difficulty many school districts currently face in finding qualified applicants for such positions.

The proposed standards have been presented to the RID and CED for their consideration and action.

Critical Points for Development and Implementation of State Certification Standards

Several states are now in the process of developing guidelines to ensure that the quality of access services will be further developed and monitored. It should be noted that 81% of deaf children are in mainstreamed settings and that education has become the biggest employer of interpreters. As detailed in the task force report, the number of individuals providing interpreting services in educational settings (elementary and secondary levels) has reached dramatic proportions. The Report established a conservative estimate of 2400 as the number of interpreters currently working with deaf students in elementary and secondary school settings. However, a severe shortage on the supply of qualified interpreters continues to frustrate the mainstreaming process. As indicated in his personal communication, Mr. Gary Mowl who chairs an interpreting education program at NTID and is a father of three deaf children, two of who are mainstreamed with support services, recommended the following general introduction to interpreter in educational settings as shown below to be included in proposed guidelines:

> "People, including deaf children, in public K-12 school settings often require interpreting services to gain access to one another. Curricula in various subject matters and its related activities that promote learning among all people must be equally communicated and especially made fully accessible to deaf children. Interpreters in this setting are primarily responsible for the provision of access services via sign language interpreting.

Interpreting is a process of communicating spoken English into sign language, including American Sign Language or various English forms as well as rendering sign langauge, including American Sign Langauge or vairous Engish forms into spoken English. During this process of interpreting, individual differences resulting from our culturally diverse society must be considered. This may involve interpreting for an individual from the American Deaf Culture and an individual from the American hearing culture.

In addition to individual differences, an interpreting Code of Ethics must be taken into account. An example of a principle included in the Code of Ethics is that all interpreting done shall remain confidential. Another example of a principle is that all interpreting done will be accurate and that interpreters shall be neutral and unobtrusive during this process.

Therefore, interpreters are professionals who have the skills needed to communicate a message expressed in one language into another language for individuals who come from all aspects of our culturally diverse society.

The field of interpreting is a rapidly growing profession. Legislations such as the American Disabilities Act and the Individuals with Disabilities Education Act have greatly increased the demand for interpreting services throughout the United States. In addition, and more than ever, hearing and deaf people are interacting in all aspects of our society. Today, interpreters can be found in scores of situations such as educational, legal, medical and theatrical settings.

> Within these different settings, an interpreter may work for a variety of clients on a "per job" basis as a free lance or private practice interpreter or may hold a full-time interpreting position. In the United States, educational settings are the leading employers of interpreting services."

Further, Mr. Mowl offers a variety of suggestions that can be made on how an educational interpreter may accomplish his or her job. The following are issues that may be raised in the proposed guidelines that must be considered and resolved before developing job descriptions. Included are recommendations for resolutions. The primary goal of this section is to make clear the role of Educational Interpreters will be in order to do their job.

1) Common recommendations, considerations and practices that Educational Interpreters could have perhaps additional tasks, i.e., teacher aide or assistant, notetaking, tutoring and hall monitor, must be avoided. The State Education Department should establish an educational interpreter title classification and charge its school districts to follow this establishment. Dual roles or even multiple roles create unnecessary expectations that cannot or should be fulfilled in the first place. Urban and rural differences may have played a major role in the consideration of additional tasks as rural areas may have difficulty in fulfilling full-time justifications based on the suggested definition of educational interpreter in this memo. Whatever the differences may or may not be, definition and standard should be clear and should not be influenced by differences.

2) Common requests have been made to have the Educational Interpreter assume responsibility to interpret in conferences such as parent-teacher or IEP conferences

should be avoided. This practice should not be permitted as this scenario puts everyone at discomfort if interpreting issues were to be addressed. The Educational Interpreter could assume an educational role in this situation if deemed necessary and appropriate but to be responsible for the interpretation at the same time would be a mistake.

3) Common requests have been made to have the Educational Interpreter assume responsibility to interpret after school and evening activities. Again, this practice should not be permitted for an number of reasons. Mainly, workload considerations in preventing disabling injuries should be seriously scrutinized if we are to maintain the current supply of educational interpreters.

   Therefore, it is recommended that the school district create itinerant interpreting positions solely for the purposes of addressing issues #2 and #3 above. Further, itinerant interpreters should have dual certificates.

4) Educational Interpreters are frequently called upon to serve as an expert on deafness. This expectation should be modified as much as possible. A good Educational Interpreter would know resources in the educational and local community, including deaf adults and deaf-related organizations, that could provide diverse experiences for the school and its people.

5) Educational Interpreters are frequently called upon to teach sign language. Educational Interpreters generally are lifelong sign language learners of the language and are not trained to teach sign language. This expectation should be modified as well. Again, a good Educational Interpreter would know and could serve as a

resource. Sign Language Teaching is a profession of its own and there are teaching sign language principles and practices that are used in sign language education classes.

**Job Description**

In the final analysis, based on the number of issues and considerations spelled out in this paper the following job description of primary responsibilities and qualifications may be adopted as a model job description for an educational interpreter.

Primary Responsibilities

- The Educational Interpreter will be primarily responsible for providing access services in K-12 classroom and related settings via sign language interpreting services.
- The Educational Interpreter will interpret in various classes that will include subjects such as reading, composition, mathematics, social studies and science.
- To facilitate ongoing quality of interpreting services, the Educational Interpreter will prepare for the primary task and maintain currency in the field of educational interpreting.
- The Educational Interpreter shall adhere to the RID Code of Ethics adopted by the State Education Department.

Qualification

- The Educational Interpreter shall possess a college degree in interpreting or possess a college degree and demonstrate completion of an interpreter education program.

- The Educational Interpreter shall have demonstrated evidence of a broad-based arts and sciences background including English, literature, mathematics, science and history.
- The Educational Interpreter shall have demonstrated evidence of familiarity with educational principles and practices including language development and child development.
- The Educational Interpreter shall possess certification as Educational Interpreter from the state education department or shall so within one year of appointment.
- Additional certifications from RID is desired.

The use of equivalent experience was purposefully left out of the above descriptions. Equivalency can easily be claimed and must be avoided. When hiring considerations and decisions need to be made, the most important qualification is degree in interpreting or degree and interpreter education completion in addition. This expectation is fundamental to providing sign language interpreting services. For example, a person having sign language knowledge, skills and competence have been seen in the same light as a person who has interpreting knowledge, skills and competence. It will important to note that sign language knowledge, skills and competence is a pre-requisite to gaining interpreting knowledge, skills, and competence. The two foundations must not be seen as equivalents.

APPENDIX A

Educational Interpreting Conditions Nationally

1. Educational interpreting evolving as a vocation
2. Interpreters work at all educational levels
   - Elementary - Postsecondary
   - Responsibilities vary
3. Most schools have little or not experience
   - Job description
   - Roles and responsibilities
   - Recruitment/Assessing qualifications
4. Working conditions vary
   - Compensation and benefits
   - Hours and schedules
   - Supervision and evaluation
   - Professional development and advancement
   - Physical environment
5. Many schools in need of well-informed, impartial guidance
6. Educational interpreters seeking identity and status
   - Little special training available for educational setting
   - No special certification
   - Need advocacy/guidelines for satisfactory working conditions
7. Need for better "consumer" education

APPENDIX B

| PROBLEM | ADVOCATE |
|---|---|
| Inappropriate job titles, e.g., "aide". | Establish "educational interpreter" as generic title for the vocation.<br><br>Specific title should reflect major responsibilities. |
| Absent or vague job description. | Detailed job description which meets local specifications. Should include needed qualifications and be shared with applicants in advance of hiring. |
| Inappropriate interpreting role, e.g.:<br>- Student may not have language. base needed for use of interpreter.<br>- May not use interpreter. | Fundamental role to facilitate communication between deaf student and others. If not,re-assess need. |
| Conflict between interpreting and non-interpreting duties in classroom. | Interpreting to take priority over other classroom duties. |

| PROBLEM | ADVOCATE |
|---|---|
| Reluctance of interpreter to accept other classroom duties when not interpreting. | Re-examine job description and responsibilities. |
| Interpreter exercises his/her preferred style (mode) of interpreting. | School prescribes mode(s) of communication to be used in interpreting and hires accordingly or provides necessary training. |
| Interpreter expected to assume non-interpreting responsibilities for which he/she doesn't have training or knowledge, e.g., tutoring, sign language instruction. | School provides or underwrites necessary preparation to assume responsibility. |
| Inappropriate application of RID Code of Ethics by interpreter to educational situation. | Exercise of ethical judgment inclusive of age of student and health, safety, and educational consideration. |

| PROBLEM | ADVOCATE |
|---|---|
| Interpreter asked to assume inappropriate classroom roles, e.g., instruction, classroom supervision. | Responsibilities of interpreter made clear to teachers and others, including students. |
| School has limited or no experience in hiring educational interpreters. | Specific recommendations regarding job description, announcement, selection. |
| Inappropriate or unreasonable expected qualifications. | Recommendations regarding general education, background, training, certification, experience, special skills. |
| Unsatisfactory working conditions:<br>(a) Compensation, hours, benefits<br>(b) Schedule<br>(c) Supervision and evaluation<br>(d) Professional development and advancement<br>(e) Physical environment. | Specific recommendations pertaining to each. |

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